

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Cause No.: 4:24-cr-00396-SEP-JSD-1
vs.	)	
	)	
LAURENTIU MIGUEL IVAN,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE OUT OF TIME**

COMES NOW, Matt Sander, Attorney for Defendant, and respectfully requests that this Honorable Court allow Defendant to file his Motion for Extension of Time to File Pretrial Motions out of time.

As grounds for this request, Counsel states as follows:

- 1) The previous deadline for filing pretrial motions was January 6, 2025.
- 2) Defense Counsel saw an order come through email which extended a co-defendant’s pretrial motion deadline.
- 3) Defense Counsel mistakenly updated Mr. Ivan’s deadline in Counsel’s legal calendar to the co-defendant’s new deadline prior to filing any motion in this case.
- 4) Upon notification, Defense Counsel realized the mistake and filed a motion to continue the deadline on today’s date.

WHEREFORE, Defendant prays that this Honorable Court grant his request, and any other relief this Court deems just and proper.

Respectfully Submitted,

FISCHER AND BYRNE, LLC

/s/ Matt Sander

MATT SANDER, #70344MO

[CJA Appointment]

Attorney for Defendant

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**CERTIFICATE OF SERVICE**

The above-signed certifies that a copy of the foregoing was served to the District Court as well as the United States Attorney's Office via electronic filing to the Clerk of the Court on this 13th day of January, 2025.